

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO

JOHN NOAKES

PLAINTIFF,

v.

UNIVERSITY OF CINCINNATI, ET AL

DEFENDANTS

Case No. 1:23-cv-00284-MRB

Judge: BARRETT

UNOPPOSED MOTION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

Plaintiff John Noakes respectfully requests leave to file the Reply to the Opposition to the Motion for Preliminary Injunction under seal.

The documents to be filed under seal are derived from students' "education records" protected from disclosure by the Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C. § 1232g.

This Court previously granted leave to file exhibits and Defendant's Response to Plaintiff's Motion for Preliminary Injunction under seal. (9/13/2023 Docket Entry.) Plaintiff's proposed Reply references, and quotes from, this Response and other sealed documents. Plaintiff incorporates the arguments contained in Joint Motion for Leave to File Under Seal previously submitted by the parties. (Doc#27.)

Counsel for Defendants has indicated no opposition to this Motion.

**Wherefore**, Plaintiff should be granted leave to file the Reply to the Opposition to the Motion for Preliminary Injunction under seal.

Respectfully submitted,

/s/ Joshua A. Engel  
Joshua Adam Engel (0075769)  
ENGEL AND MARTIN, LLC  
4660 Duke Dr., Suite 101  
Mason, OH 45040  
(513) 445-9600  
engel@engelandmartin.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been electronically served via the Court's electronic filing system this September 27, 2023 upon all counsel of record.

/s/ Joshua Engel  
Joshua Engel